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9 **DISTRICT COURT**
CLARK COUNTY, NEVADA
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11 Pamela Brown, Individually, and as
12 Special Administratrix of the Estate of
13 James Brown,

14 Plaintiffs,

15 vs.

16 United States of America

17 Defendant.
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Case No.: 2:20-cv-01814-CDS-DJA

**Stipulation to Extend Remaining
Deadlines (Fifth Request)**

24 Pursuant to Local Rule 26-4 and Local Rule IA 6-1, the parties respectfully
25 request a 60-day extension of the remaining deadlines. This is the fifth request for an
26 extension of time.
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A. Discovery completed to date

This is a complex medical malpractice wrongful death case. The parties have provided disclosures, exchanged written discovery including numerous medical records, and subpoenaed multiple third parties. The parties have deposed the plaintiff, other family members of the decedent, and two of the medical providers who treated the decedent. The deadlines for amendment and to add parties have passed. The parties have closely cooperated to move discovery forward. The deposition of Dr. Ayat, a cardiologist who treated the decedent was taken on April 18, 2022.

B. Remaining Discovery

The parties have completed fact witness depositions and are very near the completion of written discovery. The main tasks remaining in discovery are disclosure of rebuttal experts and rebuttal reports, and conducting expert and rebuttal witness depositions.

C. Reasons for Requested Extension

Rebuttal Expert Disclosures are currently set for August 22, 2022, and Discovery is currently set to close on September 22, 2022. Parties are concerned that it will be difficult to complete expert witness and rebuttal expert witness depositions prior to the close of discovery. Additionally, Plaintiff's counsel is anticipating ophthalmological surgery which will further limit the availability of deposition dates.

Given the above, the parties are seeking this extension to allow sufficient time to complete the necessary discovery in this complex case. The parties have and will continue to cooperate in conducting discovery and are seeking this extension in good faith and without purpose of delay.

D. Proposed revised Discovery Schedule

	Current due date	Proposed due date
Discovery Cut-Off	September 22, 2022	November 22, 2022
Rebuttal Expert Disclosures	August 22, 2022	October 24, 2022
Dispositive Motions	October 24, 2022	December 27, 2022
Pre-Trial Order	November 23, 2022	January 23, 2023

Respectfully submitted this 19th day of August, 2022

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/s/ Danial Laird

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IT IS SO ORDERED



 UNITED STATES MAGISTRATE JUDGE

DATED: August 22, 2022